

## REMARKS/ARGUMENTS

### Request for Reconsideration

The applicant thanks Primary Examiner Johnson for the courtesies extended to applicant's representative during the personal interview on July 17, 2007.

The applicant does not wish to amend currently presented claims in view of what was discussed in the personal interview. Instead, the applicant respectfully request reconsideration of the pending claims. Below is a representative list of some of the arguments presented during prosecution of this application, the applicant respectfully asks the Office to reconsider patentability of the current claims in view of the entire prosecution history as a whole:

- The Kuhar reference teaches away from modifying the Gertzson device as recited in the applicant's claims; Kuhar's objective is simplify needed component parts by replacing all component parts of Gertzson with a spring motor assembly.
- Combining Gertzson and Kuhar would have destroyed the Gertzson device because one would have removed the cord lock, the pulley wheels, and the cord guides from the Gertzson device.
- There are many prior art references that teach the importance of having less component parts in a window blind (please see Affidavit by Jerry Zerg, submitted July 17, 2007).
- The general trend in the industry was to simplify component parts in a window blind, and Kuhar achieved this objective. One would not have wanted to retain the pulley wheels of Gertzson, when combining Gertzson and Kuhar (although the applicant respectfully disagrees that there was any motivation to combine the two). One skilled in the art would have simply replaced all inner component parts of Gertzson because that's what was taught in Kuhar and in the prior art.
- The embodiments as claimed in the instant application offer unexpected results: lighter weight, lower manufacturing cost, smaller head rail, among others.
- Please see 1.132 Affidavit by Jerry Zerg on **unexpected results**, and **teaching away**.
- Please see 1.132 Affidavit by Li-Ming Cheng on **unmet needs, unexpected result, commercial success, copying of others**.
- Please see 1.132 Affidavit by Theodor Crous Swart on **commercial success**.

- Please see 1.132 Affidavit by ChingHo Chao on **unmet need**.

Overall, the applicant has presented sufficient objective evidence of non-obviousness in facts and in opinions, to rebut the Office' prima facie obviousness finding.

The applicant respectfully requests that the Office make a fresh consideration of patentability base on the totality of the evidence, and compare it to the evidence in the prior art that previously supported an prima facie obviousness rejection.

The applicant respectfully reminds the Office that comparison should not be made between the current claims with Gertzson as modified by Kuhar. This may force a comparison of the invention with itself. *In re Chapman, 148 USPQ 711*.

### **Request For Allowance**

Claims 50-73 are pending in this application. The applicant thanks Examiner Johnson for his dedication and helpful advice throughout the examination of this application. The applicant hereby respectfully requests allowance of all pending claims.

Respectfully submitted,  
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